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APR 10 2015  
United States District Court

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U.S. DISTRICT COURT

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DEPUTY

EASTERN DISTRICT OF TEXAS

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

V.

1:15-MJ- 81-KFG

IAN CHRISTIAN ANDERSON

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief.

On or about February 14, 2015, in the Eastern District of Texas, IAN CHRISTIAN ANDERSON, did knowingly travel in interstate commerce for the purpose of engaging in illicit sexual conduct with an individual younger than 18 years of age, in violation of 18 USC 2423(b).

I further state that I am a Special Agent with the FBI and that this complaint is based on the following facts: See Attached Affidavit.

Michael A. Geller

Signature of Complainant

Sworn to before me and subscribed in my presence, on April 10, 2015, in Beaumont, Texas.

Keith Giblin

HONORABLE KEITH GIBLIN  
UNITED STATES MAGISTRATE JUDGE

1.15mj81-KFG

**AFFIDAVIT**

I, Michael Collier being first duly sworn, state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI), and have been since 2013. I am assigned to the Houston Division- Beaumont Resident Agency. Prior to that, I was a Protective Security Specialist contracted to the Department of State, and served in the United States Army. During my employment with the FBI, I received instruction and participated in several investigations dealing with child sex assault and pornography, specifically those related to enticement and travelers. I have also consulted other Agents experienced in the matters. I have personally participated in this investigation and am aware of the facts contained herein based upon my own investigation as well as information provided to me by other law enforcement officers. This Affidavit is submitted for the sole purpose of establishing probable cause to secure a criminal complaint and the issuance of an Arrest Warrant. I have not necessarily included each and every fact known by the government concerning this investigation.

**OMEGLE**

2. Omegle is a free online chat website that allows users to communicate with strangers without registering. The service randomly pairs users in one-on-one chat sessions where they chat anonymously. The site also provides an Omegle mobile application that lets users chat with strangers from certain mobile devices. There is no video chat functionality on the mobile application, unlike the web counterparts.

**KIK**

3. Kik is a smartphone messenger application available for most iPhone, iPod, Android, and Windows 7 devices. Kik Messenger lets users send text, pictures, videos, sketches, and other files within the Kik app. Kik is free to download and uses an existing Wi-Fi connection or data plan to send and receive messages. Kik uses usernames to identify their users. Only those people that users choose to share their username with are able to contact them on Kik. A Kik username is the only unique identifier in the Kik system, and the only way Kik can identify a unique Kik account. Kik Interactive is located In Ontario, Canada.

**OOVOO**

4. Oovoo is a free video chat and messaging application available for Android and Apple cell phones. Oovoo may also be used on a computer by downloading the software from the website [www.oovoo.com](http://www.oovoo.com). Users can send messages to anyone, even during a video chat. Users can chat up to 12 people at a time and users can see up to 4 people at once on their screen during the video chats.

**PROBABLE CAUSE**

5. On March 22, 2015, Sergeant Cody Davis, Lumberton Police Department in Texas, interviewed the mother of Jane Doe, born in 2000, regarding the text messages she discovered on Jane Doe's cell phone. The text messages were sent and received between Jane Doe and the user of the phone number 443-250-6984 ("the Subject"). The Subject made sexually explicit comments to Jane Doe that indicated that Jane Doe and the Subject had been sexually active with one another. The mother confronted Jane Doe regarding the text messages and Jane Doe

admitted that she had had sex with someone named Ian Anderson. The mother provided Sergeant Davis with Jane Doe's cell phone.

6. On March 22, 2015, and on March 24, 2015, Sergeant Davis interviewed Jane Doe. Jane Doe advised that in late January 2015, or early February 2015, she met the Subject, who identified himself as Ian, on the internet chatroom Omegle. Jane Doe and the Subject communicated for approximately 10 to 15 minutes, and before terminating their communication, they exchanged contact information. Jane Doe advised the Subject that she was 14 years old and the Subject advised Jane Doe that he was 25 years old. Jane Doe and the Subject then began communicating with one another via Kik. Jane Doe advised that the Subject was from Baltimore, Maryland, he was a dancer, worked with computers, and that his birthday was July 28, 1989.

7. According to Jane Doe, on approximately February 14, 2015, the Subject traveled from Maryland to Lumberton, Texas, and rented a room at the Days Inn Hotel. The Subject picked up Jane Doe in a Nissan Altima and drove Jane Doe to the Days Inn Hotel. Inside the hotel room, Jane Doe performed oral sex on the Subject, the Subject performed oral sex on Jane Doe, and the Subject and Jane Doe engaged in unprotected vaginal intercourse and the Subject ejaculated inside her. The Subject provided Jane Doe with "the morning after pill."

8. On approximately February 15, 2015, Jane Doe met the Subject near her residence. The Subject drove Jane Doe to a nearby street where they performed oral sex on one another and vaginal intercourse. The Subject did not ejaculate inside Jane Doe.

9. On approximately February 16, 2015, Jane Doe saw the Subject near her residence where they talked. The Subject traveled back to Maryland on February 16, 2015. Jane Doe and the Subject continued to communicate with one another utilizing Kik and Oovoo.

10. On approximately March 17, 2015, the Subject picked up Jane Doe in a grey Ford pickup truck and drove Jane Doe to a nearby area and parked. Jane Doe performed oral sex on the Subject and they engaged in vaginal intercourse. Later that same day, the Subject picked up Jane Doe and drove her to the Days Inn Hotel. Inside the hotel room, the Subject provided Jane Doe with a pregnancy test.

11. On approximately March 18, 2015, the Subject picked up Jane Doe and drove Jane Doe to a nearby area and parked. Jane Doe performed oral sex on the Subject and they engaged in vaginal intercourse. Later that same day, the Subject picked up Jane Doe again and drove her to the Days Inn Hotel. Inside the hotel room, they performed oral sex on one another, and engaged in vaginal and anal intercourse. The Subject provided Jane Doe with "the morning after pill." On approximately March 19, 2015, and March 20, 2015, Jane Doe saw the Subject near her residence where they talked. Before the Subject left on March 20, 2015, he provided Jane Doe with a vibrator.

12. A review of Jane Doe's cell phone's contact list showed the name "Ian" listed with the telephone number 443-250-6984. Below is a summary of the text messages sent and received between Jane Doe and the Subject, which occurred on approximately March 20, 2015:

a. At 5:20 pm, the Subject stated "I love you too baby doll I'm already planning when I'm coming back down."

b. At 5:36 pm, Jane Doe asked the Subject if he was home and the Subject responded "I wish baby :( I'm boarding the last flight to go home now."

c. At 8:52 pm, Jane Doe and the Subject discuss that Jane Doe has not received her period for that month. The Subject stated "Ok well just give it until the end of the weekend and if you still don't have by Monday, take the second test I gave you."

d. At 9:07 pm, Jane Doe stated "Ok...and we can't have sex again anytime soon..."

e. At 9:14 pm, Jane Doe asked the Subject what would they do if she were pregnant. The Subject responded "Well you said yourself that you are not a believer of getting an abortion so we would then have to have the baby. Now if you do you have the baby you can choose to raise it which I don't think is a really good idea considering you're going to be in high school or you can choose to give it up for adoption which is probably the best course of action."

f. At 9:21 pm, the Subject stated "baby it's okay your period is going to come I promise. The pill is just throwing your cycle I guarantee you will probably have it tomorrow or Sunday."

g. At 9:54 pm, Jane Doe asked the Subject if he still wanted to video chat using oovoo. The Subject stated "Yes just call me when you're ready baby... Actually let me sign in on my iPad."

13. Below is a summary of the text messages sent and received between Jane Doe and the Subject, which occurred on approximately March 21, 2015:

a. At 4:35 pm, Jane Doe stated "I love you Mr.Anderson."

b. At 5:03 pm, Jane Doe sent a picture of herself wearing a multi-colored plaid shirt and a dark colored shirt underneath the plaid shirt. The following text accompanied the picture “#Nomakeup #bfshirt #smells #amazing”. At 5:19 pm, the Subject stated “My shirt looks so good on you.”

c. At 9:39 pm, the Subject stated “Mmmmmm God I miss sliding inside your ass baby.”

14. On March 23, 2015, Sergeant Davis responded to the Days Inn Hotel and requested hotel receipts for the dates in question. Sergeant Davis obtained hotel receipts that revealed that Ian Anderson stayed at the Days Inn Hotel from February 14<sup>1</sup>, 2015, until February 17, 2015, and again from March 16, 2015, until March 20, 2015. The address listed on the March Days Inn Hotel Receipt was 101 Meadows Road, Owings Mills, Maryland 21117. The general manager advised Sergeant Davis that when a customer checks into the hotel, they are required to show identification. The general manager advised that he had a Maryland Driver’s license number A536326115584 on file for Ian Anderson.

15. On March 24, 2015, Sergeant Davis contacted Enterprise Rent-a-Car and confirmed that Ian Anderson rented a Toyota vehicle in February 2015 and a grey Ford F-150 in March 2015. Sergeant Davis obtained a copy of the rental contract for the Ford F-150. Under the renter information it listed Ian Anderson, 101 Meadow Road, Owings Mills, Maryland 21117, date of birth: 07/25/1979, phone number 443-250-6984.

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<sup>1</sup> Even though the documents show the dates February 14, 2015, to February 17, 2015, the Days Inn Hotel general manager advised Sergeant Davis that Ian Anderson did not check into the hotel until February 15, 2015.

16. On March 24, 2015, Jane Doe was shown a photo array of six white males. One of the photos used was from Ian Anderson's Maryland driver's license. After viewing the photo array, Jane Doe was unable to successfully identify Ian Anderson.

17. An administrative subpoena was served on Sprint requesting subscriber information relating to the phone number 443-250-6984. Sprint provided the following information relating to the account:

Name:	Ian Anderson
Billing Address:	101 Meadow Road, Owings Mills, Maryland 21117
Billing Address Effective:	12/05/2013
Account Establish Date:	06/24/2011

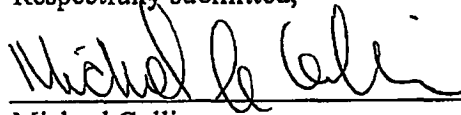
18. Maryland Motor Vehicle Administration records list Ian Christian Anderson at 101 Meadow Road, Owings Mills, Maryland 21117. The driver's license number is A536326115584. The date of birth listed is 07/25/1979.

**FEDERAL CRIMINAL VIOLATION**

19. In violation of Title 18, United States Code, Section 2423(b), Ian Christian Anderson did travel in interstate commerce for the purpose of engaging in illicit sexual conduct with an individual younger than 18 years of age.



Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael Collier", written over a horizontal line.

Michael Collier  
Special Agent  
Federal Bureau of Investigation

Subscribed and sworn to before me  
on April 10, 2015:

A handwritten signature in black ink, written over a horizontal line.

UNITED STATES MAGISTRATE JUDGE